



## Shell Oil Products US

Puget Sound Refinery

P.O. Box 622

Anacortes, WA 98221

Tel 360.293.0800

Fax 360.293.0808

Email [pugetsound@ShellOPUS.com](mailto:pugetsound@ShellOPUS.com)

Web-Plant [www.shellpugetsoundrefinery.com](http://www.shellpugetsoundrefinery.com)

Web-Corporate [www.shellus.com](http://www.shellus.com)

June 25, 2013

Director, Air Enforcement Division  
Office of Regulatory Enforcement  
U.S. Environmental Protection Agency, Mail Code 2242-A  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460-0001

Subject: *United States v Equilon Enterprises, LLC*  
Civil Action Number H-01-0978  
Southern District of Texas entered August 21, 2001

Flaring Incident Report – June 7, 2013  
Shell Oil Products US, Puget Sound Refinery

Dear Sir or Madam:

Pursuant to Section VIII, Paragraph 136 of the consent decree in *United States v Equilon Enterprises LLC*, Civil Action Number H-01-0978, entered August 21, 2001 by the United States District Court for the Southern District of Texas, Shell Oil Products US submits the following information regarding a Acid Gas Flaring Incident, as defined in Paragraph 120(d), that occurred at the Puget Sound Refinery. The incident was investigated and a detailed report listing the root causes is included in the attached Incident Report.

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and that I have made a diligent inquiry of those individuals immediately responsible for obtaining the information and that to the best of my knowledge and belief, the information submitted herewith is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

If you have any comments or questions regarding this information, please contact Tim Figgie at (360) 293-1525.

Sincerely,

Thomas J. Rizzo  
General Manager

Enclosure

PSR0000612

## FLARING INCIDENT REPORT

Type of Incident: ☒ Acid Gas / SWSG ☐ Tail Gas ☐ Hydrocarbon

On June 7, 2013 at approximately 11:30 AM, Instrument & Electrical technicians began troubleshooting a recurring FCCU computer control system status alarm. In the course of troubleshooting the computer status alarm, a FCCU upset occurred due to inaccurate data generated from the faulty computer system. At this point Operations could not rebalance the unit so they determined that the safest course of action was to trip out the FCCU. This resulted in excess flaring and high H<sub>2</sub>S in the flare gas. The faulty computer cards were replaced and the FCCU was restarted without incident at approximately 11PM on June 7. This event was unavoidable due to a malfunctioning computer system. This event did not result in flaring of more than 500 lbs of SO<sub>2</sub>.

As a result of the FCCU being down, the amount of Amine Acid Gas (AAG) generated at the refinery was reduced so Operations decided to put SRU 3 in hot-standby. At about that same time, the inline burner on SRU3 went out for unknown reasons. Therefore, Operations was going to shut down SRU3 and keep all AAG in SRU4. At that moment, Operations inadvertently shut down SRU4 instead of SRU3. This resulted in the flaring of AAG and more than 500 lbs of SO<sub>2</sub>. The SRU 3 trip resulted in the emission of 16 lbs of SO<sub>2</sub> from the SRU 3 which has been added to the total release amount below. The SO<sub>2</sub> limit of 1000-ppm SO<sub>2</sub> corrected to 7% excess air was not exceeded.

<b>Incident Start Date:</b>	6/7/2013	<b>Incident Start Time:</b>	2:00 PM
<b>Incident End Date:</b>	6/7/2013	<b>Incident End Time:</b>	3:15 PM

<b>Estimated Sulfur Dioxide Emissions:</b> <b>(Attach below):</b>	842	<b>Pounds</b>
SO <sub>2</sub> lbs/hr = 0.995*(flare gas flow, MSCFH * 1000) * (Sulfur, vol% / 100) * (64.0648/379), where 0.995 is flare efficiency, 64 #/#-mole is the MW of SO <sub>2</sub> and 379 is scf/#-mole		

### Steps taken to limit the duration and/or quantity of sulfur dioxide emissions:

The FGR system was operating to recovery as much excess flare gas as possible.

### ANALYSIS OF INCIDENT AND CORRECTIVE ACTIONS

No additional information attached

#### Primary and contributing causes of incident:

The initiating root cause of this event was the inadvertent trip of the SRU3.

Analyses of measures available to reduce likelihood of recurrence (evaluate possible design, operational, and maintenance changes; discuss alternatives, probable effectiveness, and cost; determine if an outside consultant should be retained to assist with analyses):

Operations personnel were instructed of the importance of following proper unit shutdown procedures.

#### Description of corrective action to be taken (include commencement and completion dates):

See above.

If correction not required, explain basis for conclusion:

See above.

The incident was the result of or resulted in the following (check all that apply):

- ☒ Error from careless operation
- ☐ Equipment failure due to failure to operate and maintain in accordance with good engineering practice
- ☐ Sulfur dioxide emissions greater than 20 #/hr continuously for three or more consecutive hours
- ☐ Caused the number of Acid Gas or Tail Gas incidents in a rolling twelve-month period to exceed five
- ☐ None of the above

Was the root cause identified as a process problem isolated within an SRP?

- ☐ Yes (An optimization study of the affected SRP is required as part of the corrective actions identified above.)
- ☒ No

The root cause of the incident was:

- ☒ Identified for the first time since March 21, 2001
- ☐ Identified as a recurrence since March 21, 2001 (explain previous incident(s) below)

Was the root cause of the incident a malfunction?

- ☐ Yes (describe below)
- ☒ No

**Definition of Malfunction:** *Any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or failure of a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.*

#### **REPORTING REQUIREMENTS**

Submit initial report, supporting documents and assessment of stipulated penalties, if any, within 30 days of the incident to the EPA Regional Office and Northwest Clean Air Agency.

If at the time the first report is submitted (within 30 days of the incident), corrective actions have not been determined a follow-up report is required within 45 days of first report (unless otherwise approved by the EPA). Provide anticipated date of follow-up report.

Prepared By: \_\_\_\_\_ Tim Figgie \_\_\_\_\_ Date: \_\_\_\_\_ June 18, 2013 \_\_\_\_\_

cc (w/enclosures):

Director, Air Enforcement Division  
U.S. Environmental Protection Agency  
c/o Matrix Environmental & Geotechnical Services  
120 Eagle Rock Avenue, Suite 207  
East Hanover, NJ 07936

Director  
NWCAA  
1600 South 2nd Street  
Mount Vernon, WA 98273

John Keenan  
Office of Air Quality (OAQ-107)  
US EPA – Region 10  
1200 Sixth Avenue  
Seattle, WA 98101